

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
	:	
v.	:	CRIMINAL NO. : _____
	:	
TYREK WILLIAMS	:	VIOLATIONS:
WILBERT STOKES	:	21 U.S.C. § 846 (Conspiracy to
	:	distribute more than 50 grams of
	:	cocaine base (“crack cocaine”)
	:	- 1 count)
	:	21 U.S.C. § 841 (Distribution of
	:	more than 50 grams of cocaine base
	:	(“crack cocaine”) - 3 counts)
	:	21 U.S.C. § 853 (Criminal
	:	forfeiture)
	:	18 U.S.C. § 2 (Aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about January 2003 through on or about May 22, 2003, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendants

TYREK WILLIAMS and
WILBERT STOKES

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute in excess of 50 grams of a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that defendants **TYREK WILLIAMS** and **WILBERT STOKES** distributed crack cocaine in the Philadelphia area.

OVERT ACTS

In furtherance of the conspiracy, and in order to accomplish its object, the following overt acts, among others, were performed by the defendants and others in the Eastern District of Pennsylvania:

1. On or about February 19, 2003, defendant **WILBERT STOKES** discussed with a Drug Enforcement Administration (“DEA”) cooperating witness over the telephone the availability of ounce quantities of crack cocaine for sale.

2. On or about February 21, 2003, defendant **TYREK WILLIAMS** discussed over the telephone with the DEA cooperating witness the price for two ounces of crack cocaine.

3. On or about February 21, 2003, defendant **WILBERT STOKES** sold approximately two ounces of crack cocaine to the DEA cooperating witness for \$1800.

4. On or about March 25, 2003, defendant **WILBERT STOKES** discussed over the telephone with the DEA cooperating witness a price of \$900 for an ounce of crack cocaine.

5. On or about March 27, 2003, defendants **TYREK WILLIAMS** and **WILBERT STOKES** over the telephone arranged to meet with the DEA cooperating witness to make a sale of three ounces of crack cocaine to the DEA cooperating witness.

6. On or about March 27, 2003, defendant **WILBERT STOKES** sold approximately three ounces of crack cocaine to the DEA cooperating witness for \$2700.

7. On or about May 2, 2003, defendant **TYREK WILLIAMS** discussed over the telephone with the DEA cooperating witness the price for two ounces of crack cocaine.

8. On or about May 2, 2003, defendant **TYREK WILLIAMS** sold approximately two ounces of crack cocaine to the DEA cooperating witness for \$1800.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 21, 2003, at Philadelphia, in the Eastern District of Pennsylvania, the defendants

**TYREK WILLIAMS and
WILBERT STOKES**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 50 grams, that is, approximately 54.5 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2003, at Philadelphia, in the Eastern District of Pennsylvania, the defendants

**TYREK WILLIAMS and
WILBERT STOKES**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 50 grams, that is, approximately 83.9 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
the defendants

**TYREK WILLIAMS and
WILBERT STOKES**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of
50 grams, that is, approximately 54.0 grams, of a mixture or substance containing a detectable
amount of cocaine base (“crack cocaine”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A),
and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846 set forth in Counts One, Two, Three and Four of this Indictment, the defendants

TYREK WILLIAMS and WILBERT STOKES

shall forfeit to the United States:

(A) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations of Title 21, United States Code, as charged in this Indictment;

(B) Any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code as charged in this Indictment.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants;

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney